

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

HONEYWELL INTERNATIONAL INC. and	)	
HONEYWELL INTELLECTUAL PROPERTIES	)	
INC.,	)	
	)	
Plaintiffs,	)	C.A. No. 04-1338-KAJ
	)	
v.	)	
	)	
APPLE COMPUTER, INC., et al.,	)	
	)	
Defendants.	)	

**MOTION FOR WITHDRAWAL OF APPEARANCE**

Pursuant to Local Rule 83.7, undersigned counsel, on behalf of the law firms of Potter Anderson & Corroon and Baker & McKenzie LLP (“PAC” and “BM”), request leave of Court to withdraw from the representation of Defendant BOE HYDIS Technology Co., Ltd. (“BOE HYDIS”) in the above-captioned matter. The conditions permitting withdrawal pursuant to Rule 1.16(b) of the Delaware Lawyers’ Rules of Professional Conduct are satisfied.

PAC’s and BM’s withdrawal is permitted because (1) the continued representation of BOE HYDIS will result in an unreasonable financial burden and (2) BOE HYDIS has failed substantially to fulfill an obligation to PAC and BM. See Delaware Lawyers’ Rules of Professional Conduct Rule 1.16(b)(5) and (6). Specifically, BOE HYDIS recently filed an action in a Korean court for protection from creditors, and a court Administrator has been appointed. That Administrator has informed PAC and BM that BOE HYDIS is unable to pay their fees going forward. Additionally, BOE HYDIS already is in arrearage to PAC and BM for significant unpaid costs and fees. For

these reasons, it would impose a significant financial hardship upon PAC and BM to continue to represent BOE HYDIS in this matter.

In accordance with the requirements of Local Rule 83.7, undersigned counsel certify that written notice advising BOE HYDIS of counsel's proposed withdrawal was sent to BOE HYDIS at its last known address via registered mail, fax and Federal Express on October 13, 2006, ten days prior to the filing of this motion.

It is therefore requested that attorneys Richard L. Horwitz and David E. Moore of Potter Anderson & Corroon LLP, and attorneys Kevin M. O'Brien (*pro hac vice*) and Jennifer Ancona Semko (*pro hac vice*) of Baker & McKenzie LLP, and their respective firms, be withdrawn as counsel of record for BOE HYDIS in this matter.

Pursuant to Local Rule 7.1.1, on October 23, 2006, counsel for BOE HYDIS informed counsel for Honeywell about the relief sought in this motion, but counsel for Honeywell has not responded as of the time of filing of this motion.

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Dated: October 24, 2006

757111/29979

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*Attorneys for Defendant  
BOE HYDIS Technology Co., Ltd.*

IT IS SO ORDERED, this \_\_\_\_ day of \_\_\_\_\_, 2006.

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United States District Court Judge

757111

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**CERTIFICATE OF SERVICE**

I, Richard L. Horwitz, hereby certify that on October 24, 2006, the within document was served via hand delivery and electronic mail and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following and the document is available for viewing and downloading from CM/ECF:

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